

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

PAUL WILLIAMS-ISRAEL, Individually  
and on behalf of all others similarly situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL  
ROBERTS, WILLIAM ROBERTS, and  
BELINDA NUCIFORA

Defendants.

Case No. 1:24-cv-07046-PK

**RICK BUNNEY’S REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF  
HIS MOTION FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF  
COUNSEL**

Lead Plaintiff Movant Rick Bunney (“Bunney”) submits this reply memorandum of law in further support of his motion for appointment as lead plaintiff and approval of lead counsel (Dkt. No. 14, the “Motion”).

Bunney’s Motion is not opposed. Four other investors originally filed motions requesting appointment as lead plaintiff and approval of counsel, but each one either withdrew their motions or filed notices informing the Court that they do not oppose Bunney’s motion. *See* Dkt. Nos. 23, 24, 25, 26. The deadline for any other party to file an opposition to Bunney’s Motion was December 20, 2024. The deadline passed and no opposition was filed.

Indeed, Bunney should be appointed as lead plaintiff because, as the other movants do not contest, he has the largest financial interest in the relief sought by the class, and is otherwise adequate to represent the class. *See* 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I).

As such, Bunney respectfully requests that the Court enter the Proposed Order (Dkt. No. 14-1): (1) appointing Bunney as Lead Plaintiff; and (2) approving Bunney’s selection of Glancy Prongay & Murray LLP and Holzer & Holzer, LLC as Co-Lead Counsel for the class.

Respectfully submitted,

DATED: December 27, 2024

**GLANCY PRONGAY & MURRAY LLP**

By: /s/ Gregory B. Linkh  
Gregory B. Linkh (GL-0477)  
230 Park Ave., Suite 358  
New York, NY 10169  
Telephone: (212) 682-5340  
Facsimile: (212) 884-0988  
glinkh@glancylaw.com

Robert V. Prongay  
Charles H. Linehan  
1925 Century Bunney East, Suite 2100  
Los Angeles, CA 90067  
Telephone: (310) 201-9150

Facsimile: (310) 201-9160

**HOLZER & HOLZER, LLC**

Corey D. Holzer

211 Perimeter Center Parkway, Suite 1010

Atlanta, Georgia 30346

Telephone: (770) 392-0090

Facsimile: (770) 392-0029

*Counsel for Rick Bunney and Proposed Co-Lead  
Counsel for the Class*

**PROOF OF SERVICE**

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On December 27, 2024, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Eastern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 27, 2024, at Brooklyn, New York.

/s/ Gregory B. Linkh  
Gregory B. Linkh